

The Honorable John C. Coughenour

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

3<sup>RD</sup> AVE SW LLC and JHA FAMILY LLC,

Plaintiffs,

vs.

RYAN JIMENEZ, ODIN PROPERTY TAX  
ADVOCATES LLC, a Colorado limited  
liability company, and KING COUNTY, a  
political subdivision,

Defendants.

NO. 2:24-cv-00552-JCC

**DEFENDANT ODIN PROPERTY  
TAX ADVOCATES LLC'S ANSWER  
TO PLAINTIFFS' COMPLAINT**

**JURY DEMAND**

Defendant Odin Property Tax Advocates LLC, hereinafter "Odin", by and through its attorney, answers Plaintiffs 3<sup>rd</sup> Ave SW LLC and JHA Family LLC's Complaint:

**I. INTRODUCTION**

This paragraph does not contain factual allegations that require an answer. All allegations directed against Defendant Odin Property are denied.

**II. PARTIES**

1. Admit to the best of Defendant's knowledge.
2. Admit to the best of Defendant's knowledge.

DEFENDANT ODIN PROPERTY TAX  
ADVOCATES LLC'S ANSWER TO  
PLAINTIFF'S COMPLAINT - 1

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1           3. Paragraph 3 contains allegations against another party, no response required.

2           4. Admit Odin Tax Property Advocates LLC was a registered Colorado and  
3 Washington company created by Ryan Jimenez. Any remaining allegations denied.

4           5. Admit Odin's principal place of business was Ryan Jimenez's previous address.  
5 Remaining allegations are denied.

6           6. Paragraph 6 contains allegations against another party, no response required.

7           7. Paragraph 7 contains allegations against another party, no response required.

8           8. Paragraph 8 contains allegations against another party, no response required.

9           9. Paragraph 9 contains allegations against another party, no response required.

10          10. Paragraph 10 contains allegations against another party, no response required.

11          11. Paragraph 11 contains allegations against another party, no response required.

12          12. Paragraph 12 contains allegations against another party, no response required.

13          13. Paragraph 13 contains allegations against another party, no response required.

14          14. Paragraph 14 contains allegations against another party, no response required.

15          15. Paragraph 15 contains allegations against another party, no response required.

16          16. Paragraph 16 contains allegations against another party, no response required.

17          17. Paragraph 17 contains allegations against another party, no response required.

18          18. Paragraph 18 contains allegations against another party, no response required.

19          19. Paragraph 19 contains allegations against another party, no response required.

20          20. Paragraph 20 contains allegations against another party, no response required.

21          21. Paragraph 21 contains allegations against another party, no response required.

22          22. Paragraph 3 contains allegations against another party, no response required.

23                           **III. JURISDICTION AND VENUE**

24          23. Paragraph 23 is a legal conclusion, no response required.

25          24. Paragraph 24 is a legal conclusion, no response required.

**IV. FACTS**

**A. Plaintiffs' SeaTac Properties and Property Tax Appeals**

25. Denied for insufficient knowledge and information.
26. Denied for insufficient knowledge and information.
27. Denied for insufficient knowledge and information.
28. Denied for insufficient knowledge and information.
- 4.[SIC] Denied for insufficient knowledge and information.
5. Denied for insufficient knowledge and information.
6. Denied for insufficient knowledge and information.
7. Paragraph 7 contains allegations against another party, no response required.
8. Paragraph 8 contains allegations against another party, no response required.
9. Denied for insufficient knowledge and information.
10. Denied for insufficient knowledge and information.
11. Denied for insufficient knowledge and information.
12. Denied for insufficient knowledge and information.
13. Denied for insufficient knowledge and information.
14. Denied for insufficient knowledge and information.
15. Denied for insufficient knowledge and information.
16. Denied.
17. Denied for insufficient knowledge and information.
18. Paragraph 18 contains allegations against another party, no response required.
19. Paragraph 19 contains allegations against another party, no response required..
20. Deny.
21. Deny.
22. Deny.

- 1           23.    Deny.
- 2           24.    Deny.
- 3           25.    Deny.
- 4           26.    Deny.
- 5           27.    Deny,
- 6           28.    Deny.
- 7           29.    Paragraph 29 contains allegations against another party, no response required. To
- 8                   the extent a response is required, allegations directed at Defendant Odin Property
- 9                   are denied.
- 10          30.    Paragraph 30 contains allegations against another party, no response required.
- 11          31.    Paragraph 31 contains allegations against another party, no response required. To
- 12                   the extent a response is required, allegations directed at Defendant Odin Property
- 13                   are denied.
- 14          32.    Deny.
- 15          33.    Paragraph 33 contains allegations against another party, no response required. To
- 16                   the extent a response is required, allegations directed at Defendant Odin Property
- 17                   are denied.
- 18          34.    Paragraph 34 contains allegations against another party, no response required. To
- 19                   the extent a response is required, allegations directed at Odin Property are denied.
- 20          35.    Denied for insufficient knowledge and information.
- 21          36.    Denied for insufficient knowledge and information.
- 22          37.    Denied for insufficient knowledge and information.
- 23          38.    Paragraph 38 contains allegations against another party, no response required. To
- 24                   the extent a response is required, allegations directed at Defendant Odin Property
- 25                   are denied.
- 26

- 1 39. Paragraph 39 contains allegations against another party, no response required. To  
2 the extent a response is required, allegations directed at Defendant Odin Property  
3 are denied.
- 4 40. Paragraph 40 contains allegations against another party, no response required. To  
5 the extent a response is required, allegations directed at Defendant Odin Property  
6 are denied.
- 7 41. Paragraph 41 contains allegations against another party, no response required.
- 8 42. Paragraph 42 is a legal conclusion and/or an allegation directed at another party, no  
9 response required.
- 10 43. Deny.
- 11 44. Paragraph 44 contains allegations against another party, no response required. To  
12 the extent a response is required, allegations directed at Defendant Odin Property  
13 are denied.
- 14 45. Paragraph 45 contains allegations against another party, no response required. To  
15 the extent a response is required, allegations directed at Defendant Odin Property  
16 are denied.
- 17 46. Paragraph 46 contains allegations against another party, no response required. To  
18 the extent a response is required, allegations directed at Defendant Odin Property  
19 are denied.
- 20 47. Paragraph 47 contains allegations against another party, no response required. To  
21 the extent a response is required, allegations directed at Defendant Odin Property  
22 are denied.
- 23 48. Deny.
- 24 49. Deny.
- 25 50. Deny.
- 26

1 51. Deny.

2 52. Deny.

3 53. Deny.

4 54. Deny.

5 55. Deny.

6 56. Deny.

7 57. Deny.

8 58. Deny.

9 59. Deny.

10 60. Deny.

11 61. Deny.

12 62. Deny.

13 63. Paragraph 63 contains allegations against another party, no response required. To  
14 the extent a response is required, allegations directed at Defendant Odin Property  
15 are denied.

16 64. Denied for insufficient knowledge and information.

17 65. Denied for insufficient knowledge and information.

18 66. Denied for insufficient knowledge and information.

19 67. Denied for insufficient knowledge and information.

20 68. Paragraph 68 contains allegations against another party, no response required. To  
21 the extent a response is required, allegations directed at Defendant Odin Property  
22 are denied.

23 69. Deny.

24 70. Denied for insufficient knowledge and information.

25 71. Denied for insufficient knowledge and information.

26  
DEFENDANT ODIN PROPERTY TAX  
ADVOCATES LLC'S ANSWER TO  
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72. Denied for insufficient knowledge and information.

73. Deny.

74. Deny.

75. Deny.

**B. Plaintiff's Burien Properties and Burien Tax Appeals**

76. Denied for insufficient knowledge and information.

77. Denied for insufficient knowledge and information.

78. Denied for insufficient knowledge and information.

79. Denied for insufficient knowledge and information.

80. Denied for insufficient knowledge and information.

81. Denied for insufficient knowledge and information.

82. Deny.

83. Deny.

84. Denied for insufficient knowledge and information.

85. Denied for insufficient knowledge and information.

86. Deny.

87. Paragraph 87 contains allegations against another party, no response required. To the extent a response is required, allegations directed at Defendant Odin Property are denied.

88. Deny.

89. Deny.

90. Paragraph 90 contains allegations against another party, no response required.

91. Deny.

92. Deny.

93. Deny.

- 1 94. Deny.
- 2 95. Deny.
- 3 96. Deny.
- 4 97. Deny.
- 5 98. Deny.
- 6 99. Deny.
- 7 100. Deny.
- 8 101. Paragraph 101 contains allegations against another party, no response required.
- 9 102. Paragraph 101 contains allegations against another party, no response required.
- 10 103. Deny.
- 11 104. Admit.
- 12 105. Admit.
- 13 106. Admit.
- 14 107. Admit that the contact information and Odin logo are accurate and that Odin was
- 15 active in Colorado for a short time while Jiminez worked for the Assessor's Office.
- 16 All remaining allegations are denied.
- 17 108. Admit only that the Facebook page cited speaks for itself. All other allegations in
- 18 paragraph 108 are denied
- 19 109. Admit only that I marketed Odin for work in Colorado. All other allegations in
- 20 paragraph 109 are denied.
- 21 110. Admit the Facebook post speak for itself. All remaining allegations are denied.
- 22 111. Admit the LinkedIn pages speak for themselves. All remaining allegations are
- 23 denied.
- 24 112. Deny.
- 25
- 26



- 1 113. Admit that at one point there were two LinkedIn profiles. All Remaining allegations  
2 are denied.
- 3 114. Admit that Odin Property did business in Colorado for a short time. All remaining  
4 allegations are denied.
- 5 115. Paragraph 115 contains allegations against another party, no response required.
- 6 116. Deny.
- 7 117. Deny.
- 8 118. The King County Code speaks for itself such that no response is required as to its  
9 contents.
- 10 119. Deny.
- 11 120. Deny all allegations against Odin Property. Allegations made against other parties  
12 require no response.
- 13 121. Deny to the extent paragraph 121 makes allegations against Defendant Odin  
14 Property.
- 15 122. Deny.
- 16 123. Deny.
- 17 124. Deny.
- 18 125. Deny to the extent paragraph 125 makes allegations against Defendant Odin  
19 Property.

20  
21 **V. FIRST CAUSE OF ACTION:  
DECLARATORY JUDGMENT**

- 22 126. Odin reasserts all the above answers to Plaintiff's allegations in the Complaint  
23 herein.
- 24 127. Deny.
- 25 128. Deny.

1 129. Deny to the extent paragraph 129 makes allegations against Defendant Odin  
2 Property.

3 130. Deny to the extent paragraph 130 makes allegations against Defendant Odin  
4 Property.

5 **VI. SECOND CAUSE OF ACTION:**  
6 **MANIFEST ERROR REFUND UNDER RCW 84.69**

7 131. Odin reasserts all the above answers to Plaintiff's allegations in the Complaint  
8 herein.

9 132. Deny to the extent paragraph 132 makes allegations against Defendant Odin  
10 Property.

11 133. Deny to the extent paragraph 133 makes allegations against Defendant Odin  
12 Property.

13 134. Deny to the extent paragraph 134 makes allegations against Defendant Odin  
14 Property.

15 135. Deny to the extent paragraph 135 makes allegations against Defendant Odin  
16 Property.

17 **VII. THIRD CAUSE OF ACTION:**  
18 **VIOLATION OF 42 USC §1983, FOURTEENTH AMENDMENT (DUE PROCESS**  
19 **CLAUSE)**

20 136. Odin reasserts all the above answers to Plaintiff's allegations in the Complaint  
21 herein.

22 137. Paragraph 137 is a legal conclusion, no response required.

23 138. Paragraph 138 is a legal conclusion, no response required.

24 139. Paragraph 139 is a legal conclusion, no response required.

25 140. Deny.

26 141. Deny.

142. Deny.

1 143. Deny.

2 144. Deny.

3 145. Deny.

4 146. Deny.

5 147. Deny.

6 148. Deny.

7 149. Deny.

8  
9 **VII. THIRD CAUSE OF ACTION:**  
10 **VIOLATION OF 42 USC §1983, FOURTEENTH AMENDMENT (EQUAL**  
11 **PROTECTION CLAUSE)**

12 150. Odin reasserts all the above answers to Plaintiff's allegations in the Complaint  
13 herein.

14 151. Paragraph 151 is a legal conclusion, no response required.

15 152. Paragraph 152 is a legal conclusion, no response required.

16 153. Paragraph 153 contains allegations against another party, no response required.  
17 Denied to the extent allegations are made against Defendant Odin Property.

18 154. Paragraph 154 contains allegations against another party, no response required.  
19 Denied to the extent allegations are made against Defendant Odin Property.

20 155. Paragraph 153 contains allegations against another party, no response required.  
21 Denied to the extent allegations are made against Defendant Odin Property.

22 156. Denied.

23 157. Denied.

24 158. Denied.

25 159. Denied.

26 160. Denied.

161. Denied.

162. Denied.

**IX. FIFTH CAUSE OF ACTION:  
CIVIL EXTORTION**

163. Odin reasserts all the above answers to Plaintiff's allegations in the Complaint herein.

164. Denied.

165. Denied.

166. Denied.

167. Denied.

168. Denied.

169. Denied.

**X. PRAYER FOR RELIEF:**

Defendant Odin Property denies Plaintiff's prayer for relief.

**AFFIRMATIVE DEFENSES**

BY WAY OF FURTHER ANSWER AND AFFIRMATIVE DEFENSES, Odin alleges:

1. Plaintiffs failed to state a claim for which relief can be granted against Defendant Odin.
2. Insufficiency of process/service of process and lack of personal jurisdiction.
3. If appropriate, Plaintiffs' alleged damages must be reduced for offsets / setoffs.
4. Plaintiffs may have failed to mitigate or otherwise minimize their alleged damages.
5. Plaintiffs failed to comply with the requirements of RCW 84.69 before bringing this action.
6. Plaintiff may have failed to exhaust their administrative processes and remedies.
7. Some of Plaintiffs' claims are barred by the statute of limitations.
8. Plaintiffs' claim for injunctive relief fails on its merits and because they have or had adequate remedies at law.

9. Plaintiffs' claims are barred by collateral estoppel.

10. Plaintiffs' claims are barred by judicial estoppel.

11. Plaintiffs may have failed to name an indispensable party.

12. Plaintiffs lack standing to seek damages under RCW 84.09.040.

**DEFENDANT'S PRAYER**

WHEREFORE having fully answered the allegations contained in Plaintiff's Complaint,  
Odin prays:

1. That Plaintiff's complaint be dismissed with prejudice;
2. That any judgment against Odin be reduced by Plaintiff's fault and / or the fault of other persons or entities, pursuant to RCW 4.22 et seq.;
3. That Odin be awarded their statutory attorney's fees and costs incurred defending this action; and
4. For such other and further relief the Court deems just and equitable.

DATED this 18<sup>th</sup> day of October, 2024.

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DEFENDANT ODIN PROPERTY TAX  
ADVOCATES LLC'S ANSWER TO  
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**PROOF OF SERVICE**

I certify that I filed the foregoing with the Court and caused to be delivered to the below parties or their counsel of record a copy of this document addressed as follows:

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I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 18<sup>th</sup> day of October, 2024, at Bellevue, WA.



Sunaina Aswath, Paralegal

DEFENDANT ODIN PROPERTY TAX  
ADVOCATES LLC'S ANSWER TO  
PLAINTIFF'S COMPLAINT - 14

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